Hearing Date and Time: April 29, 2010 at 9:45 a.m. (Prevailing Eastern Time)

Timothy F. Nixon Carla O. Andres (*Pro Hac Vice*) GODFREY & KAHN, S.C. 780 North Water Street Milwaukee, Wisconsin 53202 Telephone: (414) 273-3500 Facsimile: (414) 273-5198

Attorneys for Fee Examiner

In re:

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No. 09-50026

f/k/a General Motors Corp., et al., (Jointly Administered)

Debtors. Honorable Robert E. Gerber

STIPULATION AND ORDER FOR ADJOURNMENT OF APRIL 29, 2010 HEARING ON FIRST INTERIM FEE APPLICATION OF LFR INC.

TO: THE HONORABLE ROBERT E. GERBER U.S. BANKRUPTCY JUDGE

STIPULATION

The Fee Examiner of General Motors Corporation (n/k/a/ Motors Liquidation Company), appointed on December 23, 2009, and LFR Inc. hereby stipulate and agree that the Court may enter an order adjourning the April 29, 2010 hearing on the First Interim Application of LFR Inc. for Allowance of Compensation and for Reimbursement of Expenses for Services Rendered in the Case for the Period June 1, 2009 through September 30, 2009 [Docket No. 4436] ("LFR's First **Interim Fee Application**") on the following terms:

- i. The Fee Examiner will submit a preliminary report on LFR's First Interim Fee Application contemporaneously with his reports on all of the other first interim fee applications but will defer any specific objections or recommendations pending his receipt and review of supplemental detail to be provided by LFR Inc. in support of LFR's First Interim Fee Application.
- ii. The hearing on LFR's First Interim Fee Application will be held on the same date as the Second Interim Application of LFR Inc. for Allowance of Compensation and for Reimbursement of Expenses for Services Rendered in the Case for the Period October 1, 2009 through January 31, 2010 [Docket No. 5270] anticipated for June, 2010.

Dated: Madison, Wisconsin April 21, 2010.

GODFREY & KAHN, S.C.

By: /s/ Carla O. Andres

Timothy F. Nixon (TN 2644) Carla O. Andres (CA 3129)

GODFREY & KAHN, S.C. 780 North Water Street Milwaukee, Wisconsin 53202 Telephone: (414) 273-3500

Facsimile: (414) 273-5198 E-mail: tnixon@gklaw.com candres@gklaw.com

Attorneys for Fee Examiner

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By: /s/ Gerald DiConza

Gerard DiConza

DICONZA LAW, P.C. 630 Third Avenue, 7th Floor New York NY 10017 Telephone: (212) 682-4940

Facsimile: (212) 682-4942 E-mail: gdiconza@dlawpc.com

Attorneys for LFR Inc.

SO ORDERED, this _____ day of April, 2010

Hon. Robert E. Gerber United States Bankruptcy Judge

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